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Local Counsel to CDB Falcon Sunland Plaza, LP

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re	§	
	§	
CIRCUIT CITY STORES, INC., <i>et al.</i> ,	§	
	§	
Debtor.	§	Case No. 08-35653-KRH CHAPTER 11

**STATEMENT OF CDB FALCON SUNLAND PLAZA, L.P. OF CURE
UNDER LEASE OF NON-RESIDENTIAL REAL PROPERTY**

COMES NOW, CDB FALCON SUNLAND PLAZA, L.P. ("Landlord"), who through the undersigned counsel, hereby files its Statement of Cure Under a Lease of Non-residential Real Property, and would show as follows:

1. On November 10, 2008, Debtors filed a voluntary petition under Chapter 11 of the United States Bankruptcy Code.
2. This Court has jurisdiction over this matter in accordance with 11 U.S.C. §365, and 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. §157(b).
3. On or about April 5, 2007, Circuit City Stores, Inc. entered into a written lease agreement for commercial space at Sunland Plaza Shopping Center in El Paso, Texas ("the Lease"). The initial term of the Lease was ten (10) years.
4. On or about January 9, 2009, Debtor filed a motion for authority to sell assets outside the ordinary course of business; that motion was granted on the same day pursuant

to an order that authorized landlords to file statements reflecting the amount necessary to cure arrearages under 11 U.S.C. §§ 365(b)(1)(A) and (B), and §365(f)(2).

5. The cure obligations through the date hereof, and exclusive of any lease rejection or other, related claims, but inclusive of taxes and insurance, are as follows:

2008 Property Taxes:	\$43,471.29
2008 Unpaid Rents:	\$39,063.87 (Rent, CAM, Ins. for Nov. 2008)
<u>2009 Taxes (est.)</u>	<u>\$41,482.58</u> (Incurred on 1/01/09, but due at end of 2009)
TOTAL CURE:	\$124,017.74

DATE: 01/16/2009

/s/ Mark Stromberg

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CERTIFICATE OF SERVICE

This is to certify that on January 16, 2009, a copy of the foregoing Statement of Cure Under Non-Residential Real Property Lease is to be served by electronic means via the Court's ECF/CM system and to the following:

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